

1 EDWARD T. SAADI, Esq.
Ohio Bar No. 0075775
2 EDWARD T. SAADI, LLC
3 970 Windham Ct., Ste. 7
Boardman, OH 44512
4 Telephone: 330.782.1954
5 Facsimile: 330.266.7489
edwardsaadi@aol.com
6 (Attorney has complied with LR IA 11-2)

7 JEFFREY A. COGAN, Esq.
Nevada Bar No. 004569
8 JEFFREY A. COGAN, ESQ., LTD.
9 6900 Westcliff Drive, Suite 502
Las Vegas, NV 89145
10 Telephone: 702.474.4220
11 Facsimile: 702.474.4228
jeffrey@jeffreycogan.com
12 *Attorneys for Plaintiff Aladdin's Eatery Systems, Inc.*

13 **IN THE UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

| | | |
|---|---|--|
| ALADDIN'S EATERY SYSTEMS, INC., an |) | CASE NO: 2:18-CV-00412 APG-GWF |
| Ohio corporation, |) | |
| |) | Judge Andrew P. Gordon |
| Plaintiff, |) | Magistrate George Foley, Jr. |
| |) | |
| v. |) | <u>MOTION AND ORDER TO</u> |
| |) | <u>EXTEND DEADLINE FOR PLAINTIFF</u> |
| PHWLTV, LLC, a Nevada limited liability |) | <u>TO RESPOND TO MOTION TO DISMISS</u> |
| company; and OPBIZ, LLC, a Nevada limited |) | <u>PLAINTIFF'S COMPLAINT PURSUANT</u> |
| liability company, |) | <u>TO FED. R. CIV. P. 12(b)(1) AND 12(b)(6)</u> |
| |) | |
| Defendants. |) | (First Request) |

23 Plaintiff, Aladdin's Eatery Systems, Inc. ("AES"), by and through counsel, hereby
24 requests a 14-day extension of time to respond to Defendant PHWLTV, LLC's **Motion to Dismiss**
25 **Plaintiff's Complaint Pursuant to Fed. R. Civ. R. 12(b)(1) and 12(b)(6)** [Document #21],
26 which was filed on June 8, 2018. This Motion is made and based upon Local Rule LR IA 6-1,
27 the attached Memorandum, and the pleadings and papers on file.
28


- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

Defendant PHWLV, LLC has agreed to this request for a 14-day extension.

PHWLV, LLC's Motion presents complex issues regarding jurisdiction and construction of the Declaratory Judgment Act, 28 U.S.C. §§2201 *et seq.* AES requires additional time to fully research the issues, consult with counsel on the underlying facts, and prepare a proper response.

DATED this 19th day of June, 2018.

By: /s/ Edward T. Saadi
Edward T. Saadi, Esq.
Ohio Bar No. 0075775
970 Windham Ct., Ste. 7
Boardman, OH 44512
Telephone: 330.782.1954
Facsimile: 330.266.7489
edwardsaadi@aol.com
(Attorney has complied with LR IA 11-2)


United States District Judge
Dated: June 19, 2018

2